

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

UNITED STATES OF AMERICA

6:22-cr-00317-MC

v.

SUPERSEDING INFORMATION

ANNE HANKINS,

18 U.S.C. § 1343

18 U.S.C. § 1957

Defendant.

Forfeiture Allegations

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTORY ALLEGATIONS

At all times relevant to this information:

1. Defendant **ANNE HANKINS** was president of Willamette Country Music Concerts, LLC (“WCMC”), located in Eugene, Oregon.

2. **HANKINS** was sole member of WCMC, Inc., an Oregon Limited Liability Company. WCMC, Inc. owned a 49% interest in WCMC.

3. William Morris Endeavor Entertainment, LLC and/or its related entities (hereinafter referred to as “Endeavor”), owned a 51% controlling interest in WCMC.

Superseding Information

4. As president of WCMC, Ms. Hankins was responsible for preparing monthly financial statements, which she provided to Endeavor by email.

COUNT 1
(Wire Fraud)
(18 U.S.C. § 1343)

5. Paragraphs 1 through 4 of the Introductory Allegations are incorporated here.

6. From in or about September 2016 and continuing through September 2018, in the District of Oregon, defendant **ANNE HANKINS** devised and intended to devise a material scheme to defraud Endeavor and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

SCHEME AND ARTIFICE TO DEFRAUD

7. As part of the scheme and artifice to defraud, defendant committed or participated in the following acts:

8. As part of **HANKINS'** obligations as President of WCMC, she was responsible for preparing and submitting monthly financials, including bank statements and financial summaries, to Endeavor.

9. Beginning in or around September 2016, **HANKINS** began providing Endeavor with altered bank statements and false financial summaries. These altered bank statements and false financial summaries concealed the true financial condition of WCMC.

10. On or around November 2017, Endeavor approached **HANKINS** about purchasing WCMC, Inc.'s 49% interest in WCMC and having Ms. Hankins continue to serve as WCMC's president.

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11. On or about February 7, 2018, **HANKINS** sent an email to Endeavor that falsely reported that WCMC had approximately \$1.1 million in cash in its operating account, when, in reality, there was approximately \$16,000 in the account.

12. The false financial statement provided on February 7, 2018, was material in that it had the natural tendency to influence, or was capable of influencing, Endeavor's decision to purchase WCMC, Inc.'s interest in WCMC.

13. **HANKINS** intended to deceive Endeavor as to the accurate financial condition of WCMC.

14. On March 1, 2018, Endeavor purchased the remaining 49% interest in WCMC. As part of that transaction, Endeavor paid **HANKINS** \$1,500,000.

WIRE FRAUD

15. On or about February 7, 2018, in the District of Oregon, defendant **ANNE HANKINS**, for the purpose of executing the scheme to defraud described above, caused to be transmitted by means of wire communication in interstate commerce, from the State of Oregon to the State of California, an email to Endeavor containing a false financial information about WCMC,

All in violation of Title 18, United States Code, Section 1343.

COUNT 2 **(Money Laundering)** **(18 U.S.C. § 1957)**

16. Paragraphs 1 through 15 are incorporated herein.

17. On or about Mach 26, 2018, in the District of Oregon, Defendant **ANNE HANKINS** did knowingly engage in a monetary transaction through a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, to
Superseding Information

wit: a \$251,444.70 cashier's check issued to the Clerk of Court for the U.S. District Court for the District of Oregon, to satisfy restitution in Case No. 6:01-CR-600100-01, such property having been derived from a specified unlawful activity, that is, wire fraud, as alleged in Count 1 of this Information,

In violation of Title 18, United States Code, Section 1957.

Dated: September 28, 2022

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
GAVIN W. BRUCE, OSB #113384
Assistant United States Attorney